

**FMC Corporation**

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August 30, 2001

Mr. Charles Findley  
Acting Regional Administrator  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

Subject: Pond 18 Closure Plan, Astaris Idaho LLC.  
EPA ID No. IDD 07092 9518

Dear Mr. Findley:

Enclosed please find one copy of the revised Pond 18 closure plan for the Astaris facility. The Pond 18 closure plan proposes closure of Cell A with waste in place in accordance with 40 C.F.R. §265.228(a)(2) and closure by removal at Cell B in accordance with 40 C.F.R. §265.228(a)(1). The revised Pond 18 closure plan supersedes all previous versions of the subject closure plan.

The closure of Cell A (detailed in Volumes 1 and 2) includes the initial fill phase consistent with the elements and design criteria set forth in the EPA-approved initial fill phase of previously completed pond closures at the Astaris facility. The initial fill phase for Cell A also includes installation of temporary gas monitoring and extraction piping as a contingency for collection and treatment of phosphine and other gases that may accumulate under the temporary cover. The final cap design for Cell A is consistent with the cap design, performance criteria and level of detail set forth in the EPA approved closure plan for Pond 8S. The closure of Cell B (detailed in Volume 3) includes the removal of water and sediments, the removal and disposal of all liners, leachate system components, and any contaminated underlying soil. Confirmation sampling of the underlying soil layer will also be conducted to confirm that closure by removal criteria have been met.

The revised Pond 18 closure plan has also been updated to address previous EPA comments on other RCRA closure plans for the Astaris facility, as appropriate. Please feel free to contact me at (208) 236-8658 should you have questions regarding this information.

Very truly yours,



Rob J. Hartman  
FMC Corporation

Enclosure

cc: Andrew Boyd, EPA w/o enclosure  
Linda Meyer, EPA w/ enclosure (2 copies)  
Susan Hanson, Shoshone-Bannock Tribes w/ enclosure  
Jeanette Wolfley, Shoshone-Bannock Tribes w/ enclosure  
Chairman, Shoshone-Bannock Tribes Business Council w/ enclosure